

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
COURT FILE NO.: 17-cv-04164 DSD/DTS**

Jane Doe, Plaintiff, v. Minnesota Department of Public Safety; Minnesota Department of Public Safety Does (1-10); Kathy Daley, in her individual and official capacity; and Kim Jacobson, in her individual and official capacity, Defendant.	DECLARATION OF THOMAS J. LYONS JR. IN SUPPORT OF PLAINTIFF’S MOTION FOR LEAVE TO FILE COMPLAINT UNDER SEAL
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1. That I represent Plaintiff Jane Doe in the above-referenced case.
2. That I submitting this Declaration in support of Plaintiff’s Motion for Leave to File Complaint Under Seal.
3. As the Court is aware this case is about a woman living in fear who has done everything in her capacity to protect both her and her daughter from her ex-husband, who happens to be one of America’s most wanted men.
4. After due consideration of the immense danger Plaintiff would be in if she were ever found by Ex-Husband, the Anoka county court took the extraordinary measure of sealing the related files and records.
5. After adopting her new identity, Plaintiff necessarily relied upon agents of Defendant Minnesota Department of Public Safety (hereinafter “Defendant DPS”), Kathy Daley (hereinafter “Defendant Daley”), supervisor of the issuing department, Kim Jacobson

(hereinafter “Defendant Jacobson”), Data Practices Program Administrator, and others whose identities are currently unknown to protect her by keeping her previous identity wholly separate from her assumed identity within Department of Vehicle Services (“DVS”) database so as to prevent Ex-Husband or any of his associates from using Plaintiff’s previous identity to ascertain her assumed identity.

6. After filing her complaint without any identifying information it was brought to our attention that some Minnesota reporters have taken an interest in this case and one has filed personal information that might cause Plaintiff’s Ex-Husband to locate her and/or find her true current identity, despite all of our effort to keep this information from the public.

7. If the Court requests to see the news articles above described Plaintiff will provide them.

8. At this time for the safety and peace of mind of Plaintiff, we hereby request that the Court seal Plaintiff’s Complaint from public review.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated this 19th day of September, 2017.

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